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15 Attorneys for Plaintiffs

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA

18 THE BOARD OF TRUSTEES, in their
19 capacities as Trustees of the LABORERS
20 HEALTH AND WELFARE TRUST FUND
21 FOR NORTHERN CALIFORNIA;
22 LABORERS PENSION TRUST FUND FOR
23 NORTHERN CALIFORNIA; LABORERS
24 VACATION-HOLIDAY TRUST FUND FOR
25 NORTHERN CALIFORNIA; and LABORERS
26 TRAINING AND RETRAINING TRUST
27 FUND FOR NORTHERN CALIFORNIA,

28 Plaintiffs,

v.

ASSOCIATED SURFACE PREP, INC. doing
business as CONCREATORS, a California
Corporation,

Defendant.

No. 3:17-cv-04621-MMC

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING TIME FOR
DEFENDANT TO ANSWER
PLAINTIFFS' COMPLAINT;
~~PROPOSED~~ ORDER THEREON**

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1 Pursuant to Federal Rules of Civil Procedure 12, and Local Rule 6-1(a), Plaintiffs and
2 Defendant hereby stipulate to extend the time within which Defendant has to answer or otherwise
3 respond to Plaintiffs' Complaint.

4 Plaintiffs filed the Complaint in this action on August 11, 2017. The Complaint was
5 served on Defendant on August 21, 2017. Defendant agreed to submit to the compliance audit of
6 its books and records sought by Plaintiffs in the above-captioned litigation. The parties therefore
7 agree that the deadline for Defendant to respond to the Complaint is extended to until October 20,
8 2017, to allow the audit to be completed and additionally to allow the parties to attempt to resolve
9 this matter consensually.

10 The parties also agree that pursuant to Local Rule 6-1(a), this stipulation is respectfully
11 submitted to the Court for approval without the necessity of a hearing.

12 Dated: August 30, 2017

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

14 By: /s/ Tracy L. Mainguy
15 TRACY L. MAINGUY
Attorneys for Plaintiffs

16 Dated: August 30, 2017

PORTER LAW GROUP

17 By: /s/ Brittany Rupley Haeefe
18 Brittany Rupley Haeefe
Attorneys for Defendant

19 I hereby attest that I have on file all holographic signatures corresponding to any
20 signatures indicated by a conformed signature (/s/) within this e-filed document.

21 /s/ Tracy L. Mainguy

22 ~~PROPOSED~~ ORDER

23 Based upon the Stipulation above, the time for Defendant to respond to Plaintiffs'
24 Complaint is extended until October 20, 2017.

25 IT IS SO ORDERED.

26 Dated: August 31, 2017

27 Maxine M. Chesney
28 THE HONORABLE MAXINE M. CHESNEY

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